



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CMP
F. #2010R00449

*271 Cadman Plaza East
Brooklyn, New York 11201*

September 10, 2010

VIA ECF

The Honorable David G. Trager
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Levy Sharon
Criminal Docket No. 10-415 (DGT)

Dear Judge Trager:

The government respectfully submits this letter in response to the defendant's sentencing submission, dated August 26, 2010. On July 13, 2010, the defendant pled guilty to Count Two of the above-referenced indictment, charging a violation of Title 18, United States Code, Sections 2 and 1546(a), by aiding and abetting co-defendant Ozoda Djalilova's false statements in her permanent resident application by entering into a fraudulent marriage with Djalilova. He is scheduled to be sentenced on September 13, 2010.

The government has no objection to the accuracy of the facts presented in the Presentence Report. The government has proffered evidence of the defendant's obstructive conduct and participation in Djalilova's prostitution business in the course of the extensive pre-trial detention litigation in this case. This evidence has included transcripts of consensual recordings made by the victim of the obstruction scheme, who was a witness to Sharon's and Djalilova's sham wedding ceremony. See Government's Letter Seeking a Permanent Order of Detention, filed April 22, 2010; Letter in Support of Detention, filed April 28, 2010; and Letter in Opposition to Defendant's Motion for Bond, dated May 6, 2010.

Having entered into a plea agreement with the defendant that anticipates a total offense level of 6 (zero to six months) under the United States Sentencing Guidelines, however, the government takes no position as to the application of the sentencing enhancements advocated by the United States Probation Department.

Respectfully submitted,

BENTON J. CAMPBELL
United States Attorney

By: /s/ Cristina Posa
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cc: Michael Schneider, Esq. (via ECF)